

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 5:20-CR-12
)	
MAYNARD DAVIS,)	
Defendant.)	

MOTION FOR DETENTION

The United States of America, by and through its attorney, Christina E. Nolan, United States Attorney for the District of Vermont, moves for the pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. The defendant is eligible for detention because the case involves an offense under the Controlled Substance Act for which a maximum term of imprisonment of ten years or more is prescribed. *See* 18 U.S.C. § 3142(f)(1)(C).

2. Reason for Detention. The Court should detain the defendant because there are no conditions of release that will reasonably assure the safety of the community and the defendant's appearance in court. *See* 18 U.S.C. § 3142(e)(1). The defendant has an extensive criminal history including at least ten felony convictions. At least six of these convictions were controlled substance offenses. All six resulted in incarcerative sentences. Most recently, the defendant was convicted of cocaine sale/delivery in April of 2019 and was sentenced to 24-42 months in jail. Thereafter, in November of 2019, the defendant was convicted of simple assault and was sentenced to 44-45 days in jail. Separate from the instant offense, the defendant has been charged by the state of Vermont with two felony drug offenses which remain pending.

With regard to risk of flight, the defendant has been charged as a fugitive on three occasions, has failed to appear for court on at least three other occasions. Additionally, he has violated his probation on at least seven occasions.

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against defendant pursuant to § 3142(e).

4. Time for Detention Hearing. The United States is prepared to proceed with a detention hearing.

Dated at Burlington, in the District of Vermont, this 11th day of March, 2020.

Respectfully submitted,

UNITED STATES OF AMERICA

CHRISTINA E. NOLAN
United States Attorney

By: /s/ Nathanael T. Burris
NATHANAEL T. BURRIS
Assistant U.S. Attorney
P.O. Box 570
Burlington, VT 05402-0570
(802) 951-6725
nate.burris@usdoj.gov